

## **EXHIBIT 6**

**RIGGS, ABNEY, NEAL, TURPEN, ORBISON & LEWIS**

A PROFESSIONAL CORPORATION  
ATTORNEYS AND COUNSELORS AT LAW  
THE PARAGON BUILDING SUITE 101  
5801 BROADWAY EXTENSION  
OKLAHOMA CITY, OKLAHOMA 73118-7489  
(405) 843-9909  
Fax (405) 842-2913

November 22, 2006

GREGORY W. ALBERTY  
JACK R. ANDERSON  
THOMAS M. ASKEW  
RYAN J. ASSINK  
LISA K. BICKLE  
DONALD M. BINGHAM  
MELISSA A. BOUTIN  
WILLIAM A. BOWLES  
RICHARD B. BOYLE, IV  
KELLY L. BRATCHER  
H. JAMES BRIGGS  
PETER W. BROLICK  
SCOTT W. BYRD  
ADRIANNE N. CARRIER  
MICHELLE M. CARTER  
JILL L. CHASE  
MATTHEW P. CROUCH  
ROBERT P. DEAN  
TINA LOUISE DIAZ  
FRANCISCO LUIS DONGO  
GLENNA S. DORRIS  
JANET S. DUMONT  
IRA L. EDWARDS, JR.  
GEORGE M. EMERSON  
JEFF M. FUGATE  
RICHARD A. GANN  
BART T. GARBUTT  
RICHARD T. GARREN  
D. SHARON GENTRY  
NANCY A. GRAHAM  
STEPHEN E. HALE

MELVIN C. HALL  
SHARON E. HAMM  
ZACHERY R. HARGIS  
CHRISTOPHER S. HEROUX  
HOLLY M. HILLERMAN  
ERIK S. HOUGHTON  
ROBERT E. HOWARD  
WM. GREGORY JAMES  
STEVEN JANISZEWSKI  
KIEMONN L. JONES  
SARAH G. KIENY  
SCOTT P. KIRTLLEY  
KRISTOPHER E. KOEPEL  
TERRY D. KORDELISKI, II  
G. DIANE LEE  
MICHELLE D. LEFLORE  
JOSEPH P. LENNART  
TYLER D. LEONARD  
MICHELLE L. LESTER  
C. S. LEWIS, III  
MARY JEAN LITTLE  
GEOFFREY M. LONG  
ADRIANA LOPEZ KUPPER  
LORI T. LOVOI-NIEVES  
JOHN D. LUTON  
JANET G. MALLOW  
JOHN ROSS MALOY  
MATT D. MATHESON  
GLOYD L. MCCOY  
RAYMOND A. MELTON  
RICHARD A. MILDREN

DAVID J. MIGNEAULT  
QUSAIR MOHAMEDBHA  
J. LYON MOREHEAD  
JANICE LOGAN MORROW  
ROBERT A. NANCE  
GARY L. NEAL  
MARK L. NELMS  
MARGARET A. NUNNERY  
JAMES C. ORBISON  
NICOLE J. PETTY  
WHITNEY D. PETTY  
JAMES R. POLAN  
RICHARD P. POORMON  
DAVID L. PRICE  
VICTORIA L. RACKLEY  
FRED RAHAL, JR.  
LISA R. RIGGS  
M. DAVID RIGGS  
STEPHEN B. RILEY  
RANDALL A. RINQUEST  
ROBIN D. ROBERTS  
MARY J. ROJINDS  
WILLIAM C. SEARCY  
KRISTEN E. SHILLINGTON  
DAVID A. SIMMENTAL  
ROBERT P. SKEITH  
KENNETH M. SMITH  
SCOTT D. SMITH  
BETTY J. SOMMARS  
BEVERLY A. STEWART  
CHRISTOPHER B. SWANSON

STEPHANIE L. THEBAN  
DAVID H. THOMAS  
HARLEY W. THOMAS  
REX W. THOMPSON  
SONJA M. TREI  
MICHAEL C. TURPEN  
PHILIP J. VADEBONCOEUR  
LINDA VAN ARKEL-GREUBEL  
KAREN CARDEN WALSH  
SHARON K. WEAVER  
JOSEPH R. WELLS  
BRIAN S. WILKERSON  
DOUGLAS A. WILSON  
JERRY L. WITT  
COURTNEY M. WOLIN  
MICHAEL P. WOMACK  
GARY W. WOOD  
TRACY S. ZAHL

Of Counsel  
Benjamin P. Abney  
E. Bryan Henson

To Defense Counsel:

**Re: State of Oklahoma vs. Tyson et al. Document Production at DEQ**

Dear Counsel:

In its production of documents at the Department of Environmental Quality in response to the requests for production of documents of various defendants, the State has elected to produce the documents as they are kept in the usual course of business. As a courtesy to counsel, the State has attempted to determine which boxes of documents respond to particular requests for production, or interrogatories for which the State has previously indicated it will rely upon documents pursuant to Rule 33(d) for its response. The State has prepared an index, by box, of the documents which are responsive to requests for production and interrogatories. A copy of that index accompanies this letter.

However, given the number, the breadth, and the degree to which the many requests for production and interrogatories overlap, it is impossible to comprehensively state each and every request for production or interrogatory to which documents in each box respond. Therefore, it is the responsibility of examining counsel to review the documents produced for responsiveness and to determine which, if any, should be copied for purposes of the defense.

Additionally, certain documents have been redacted pursuant to OAC 252:4-11-2(b) to a limited extent to preserve the desired confidentiality of persons making anonymous complaints to the DEQ. Also, bank account information contained on checks and payments has been redacted.

Sincerely,



Robert A. Nance  
FOR THE FIRM